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September 14, 2001

VIA COURIER

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**ORIGINAL
RECEIVED**

SEP 14 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **NOTICE OF EX PARTE MEETING**
CC Docket No. 94-102
RM-8143
Compatibility with Enhanced 911 Emergency Calling Systems

Dear Ms. Salas:

On September 13, 2001, George Marble, Vice President, Marketing, Grayson Wireless Division ("Grayson") of Allen Telecom, Inc. ("Allen") and I had an *ex parte* meeting with representatives of the Wireless Telecommunications Bureau ("Bureau") regarding the above-referenced docket. Representing the Bureau were Thomas Sugrue, Chief, James D. Schlichting, Deputy Chief, and Kris A. Monteith, Chief, Policy Division.

We discussed Grayson's Geometrix® network-based wireless 911 location system, and the fact that the system now is compatible with wireless handsets that use the GSM air interface. Geometrix® now can provide E911 Phase II location capability for all cellular and PCS handsets using any wireless air interface, or any combination of interfaces, in use in the United States, including CDMA, GSM, AMPS, TDMA, and iDEN. The GSM capability can be implemented in new Geometrix® systems or by means of a software download into existing Geometrix® equipment now in production. Grayson designed Geometrix® to meet the current Phase II requirements for accuracy, and the system has been made available in a timeframe consistent with the October 1, 2001 implementation standard. Grayson began producing commercial-grade Geometrix equipment last December, and is prepared to manufacture and install Geometrix® location systems in sufficient quantities to meet significant carrier demand.

We also discussed test results of the Geometrix® system for the various air interfaces. Enclosed is a copy of the presentation materials from Grayson that were handed out at the meeting. The last page provides a summary of test results from the Geometrix® testing system in Fairfax County, Virginia, and demonstrates that the accuracy of Geometrix® for call locations for each air interface were compliant with the FCC E911 Phase II requirements. We also

discussed the extensive carrier field-testing of Geometrix® to date and the information assembled from this real-world experience. We discussed that no two wireless topologies or geographic morphologies are identical, and it is reasonable to expect inter- and intra-system performance variations in commercial deployments of Geometrix®, just as is experienced in the performance of wireless networks themselves. Nevertheless, testing results conclude that the overall performance of Geometrix® systems can be expected to be compliant with FCC E911 Phase II requirements and measurement guidelines. It is noteworthy that the latest software upgrades to Geometrix® for CDMA show additional improvement over already compliant accuracy results, indicating that Grayson continues to enhance Geometrix® performance via refinements in its processing algorithms. Allen Telecom continues to develop new software to improve accuracy, and software upgrades can be remotely downloaded into equipment that is already installed.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Eliot J. Greenwald', with a long horizontal flourish extending to the right.

Eliot J. Greenwald

cc: Peter A. Tenhula
Bryan Tramont
Monica Shah Desai
Paul Margie
Thomas Sugrue
James D. Schlichting
William D. Lane
Kris A. Monteith
Thomas J. Navin
Daniel F. Grosh
Martin D. Liebman
Patrick Forster
Jennifer B. Tomchin
Gregory Vadas
George Marble

Federal Communications Commission

Grayson Wireless Wireless Location System

UPDATE

September 13,
2001



Geometrix®
Wireless Location System



Geometrix® Wireless Location System GSM Update

- **GSM Compatibility Developed, Tested, Ready for Ordering**
 - Meets Phase II Accuracy Requirements
 - Accommodates Frequency Hopping and Encryption
 - Available In New Geometrix Systems and As Software Update
- **Geometrix Now Supports All Cellular & PCS Handsets (CDMA, GSM, AMPS, TDMA, iDEN)**
- **Geometrix Available for Deployment**
 - Production Began 4Q00 in Grayson's Virginia Plant
 - Currently Being Installed for Verizon Wireless in Chicago and St. Louis Areas

Grayson Wireless

Sample Test Results

- All Air Interfaces (CDMA, GSM, TDMA, AMPS, iDEN)
- Results of Carrier Testing and Demonstrations
- Geometrix® Equipment Deployed at Commercial Wireless Sites
- Used Simplest, Most Economical Version of Geometrix (TDOA, Existing Antennas)
- Varied Test Call Scenarios
 - Stationary and In-Motion Calls
 - Outside (Ground-Level, Elevated, Below Grade, Autos, Highways, Streets, etc.)
 - Inside (Autos, Offices, Hotel Rooms & Lobby, Restaurants, Parking Garages, etc.)
- Commercial Handsets
- Accuracy Reference Established With Differential GPS
- Accuracy Compliant With FCC Requirements

Fairfax County Network Example Map



Fairfax County Network Example Results

Standards	50% (meters)	95% (meters)	Comments
AMPS	85	231	CTIA Wireless 2000 Live Demo (2/2000).
IS-136 (TDMA)	89	269	CTIA Wireless 2000 Live Demo (2/2000). Recent testing (9/2001).
IS-95 (CDMA)	83	215	CTIA Wireless 2000 Live Demo (2/2000). Verizon CDG Test (9/2000). Qwest CDG Mini-Trial (4/2001).
	34	62	Latest Software Update Testing (9/2001).
iDEN	87	206	Southern LINC Demonstration (9/2000).
GSM	74	124	Recent Testing (9/2001).